REMARKS

The Examiner is thanked for the examination of the application. In view of the foregoing amendments and the remarks that follow, the Examiner is respectfully requested to reconsider and withdraw the outstanding rejections.

The amendments to the claims, and the new dependent claims are supported by paragraphs [0045] through [0048] of the published application.

Claims 1 - 19 are rejected under 35 USC 102(e) or alternatively under 35 USC 103(a), as being allegedly unpatentable over US 2004/0070782, hereinafter *Mihira*.

According to the present invention, a first control program includes a first API that is configured to receive, with the use of a predefined function, a request relating to an image processing from the second control program. In addition, a second control program includes a second API that is configured to receive a request relating to an image processing from an external source*, **wherein commands, parameters, and syntax for controlling the hardware resource are released to the public for incorporation by external users into software supported by the second API**.

It is noted that *Mihira* lacks any disclosure that teaches or suggests the above features of the invention. Because of the deficiency, *Mihira* cannot achieve the advantageous effect of the present invention. That is, the image processing apparatus according to the present invention allows easy extension of the functionality to an external source, and that extension is made with no or little alterations to existing applications. In contrast, the image processing apparatus

according to *Mihira* totally differs in structure from the present invention and thus
cannot achieve the advantageous effect described above.

The Examiner contends that the API 51, API 52 and elements 25 - 27 of
Mihira correspond to the claimed second control program. It is noted, however, that
both the API 51 and the WSF 27 merely pass to SF 28 a processing request that is
received from an external source with the use of SOAP. More importantly, there is
no teaching or suggestion in *Mihira* that the elements 25 and 26 are configured to
receive a request relating to an image processing from an external source, and
which the converts the received request to a command supported by the first API*,*
wherein commands, parameters, and syntax for controlling the hardware
resource are released to the public for incorporation by external users into
software supported by the second API.

Thus, the cited portions *Mihira* fail to disclose a combination as now defined
by the amended independent claims.

Furthermore, independent claims 1, 7, and 13 state that the second control
program includes a second API for receiving a third request relating to image
processing from an external source, and converts the received third request to a
command supported by the first API. Claim 18 recites, among other features, that
the second control program includes a second API for receiving a third request
relating to image processing from an external source, and converts the received third
request to a command supported by the first API. And, claim 19 adds that the
second API is an external API for controlling operations of the hardware resource
according to requests received from an external device.

Mihira is totally silent on the features that **commands, parameters, and syntax for controlling the hardware resource are released to the public for incorporation by external users into software supported by the second API**.

Accordingly, the Examiner is respectfully requested to reconsider and withdraw the pending rejections, and to find the new claims in condition for allowance. The new claims are dependent claims that are patentable over the applied art at least for the reasons set forth above.

In the event that there are any questions concerning this Amendment, or the application in general, the Examiner is respectfully urged to telephone the undersigned attorney so that prosecution of the application may be expedited.

Respectfully submitted,

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